

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

**FILED**

JUN - 1 2006

U. S. DISTRICT COURT  
EASTERN DISTRICT OF MO

UNITED STATES OF AMERICA,

Plaintiff

v.

**4:06CR00337CEJ**

BETONSPORTS PLC, its predecessors, holding  
companies, subsidiaries and associated entities; GARY  
STEPHEN KAPLAN, a/k/a Greg Champion; NEIL  
SCOTT KAPLAN, a/k/a Scott Kaye; LORI BETH  
KAPLAN MULTZ, a/k/a Beth; DAVID CARRUTHERS;  
PETER WILSON; NORMAN STEINBERG, a/k/a Tom  
Miller and David Norman; TIM BROWN, a/k/a Matt  
Brown; DIRECT MAIL EXPERTISE, INC.; DME  
GLOBAL MARKETING & FULFILLMENT, INC.;  
MOBILE PROMOTIONS, INC.; WILLIAM HERNAN;  
LENIS; WILLIAM LUIS LENIS; MANNY GUSTAVO  
LENIS, and MONICA LENIS,

Defendants.


**GOVERNMENT'S ENTRY OF APPEARANCE**

COMES NOW Catherine L. Hanaway, United States Attorney for the Eastern District of Missouri,  
and Michael K. Fagan, Assistant United States Attorney for said District and Marty Woelfle, Trial  
Attorney, Organized Crime and Racketeering Section, U.S. Department of Justice and hereby enter their  
appearance on behalf of the United States.

Respectfully submitted,

CATHERINE L. HANAWAY  
United States Attorney

  
MICHAEL K. FAGAN, #6617  
Assistant United States Attorney

  
MARTY WOELFLE A/E Bar #009363  
Trial Attorney, Organized Crime and Racketeering  
U.S. Department of Justice